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	SHANKEI DECLARATION	

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From: Sharkey, Lauren (CH)

To: Shannon, Timothy; Rabenstein, Reba (DC); #C-M ASTELLAS V. IMSTEM - LW TEAM;

spritchett@nixonpeabody.com; shansen@nixonpeabody.com; tlieberman@nixonpeabody.com

Cc: <u>Keown, Wayne</u>

Subject: RE: Astellas v. ImStem, No. 1:17-cv-12239-ADB (D. Mass.) - Imstem Deposition Notices

Date: Monday, June 3, 2019 11:39:27 AM

Tim,

We will follow up in due course on all the dates and availabilities, but initially I wanted to let you know that we can offer Dr. Kimbrel on June 18 and Dr. Lanza on June 20 (both in Boston).

Further, we would be available to take Dr. Wang's deposition on June 13. Please confirm this date.

Then as to Mr. Men and Dr. Xu – could we push Mr. Men to June 25? For Dr. Xu, June 28 is not going to work for our team – would July 2 be possible – you had mentioned to me he might be able to be available after his conference?

Thanks,

Lauren

From: Shannon, Timothy <tshannon@verrilldana.com>

Sent: Thursday, May 30, 2019 11:28 PM

To: Rabenstein, Reba (DC) <Rebecca.Rabenstein@lw.com>; Sharkey, Lauren (CH) <Lauren.Sharkey@lw.com>; #C-M ASTELLAS - ASTELLAS V. IMSTEM - LW TEAM <ASTELLASASTELLASV.IMSTEM.LWTEAM@lw.com>; spritchett@nixonpeabody.com; shansen@nixonpeabody.com; tlieberman@nixonpeabody.com

Cc: Keown, Wayne <wkeown@verrilldana.com>

Subject: Astellas v. ImStem, No. 1:17-cv-12239-ADB (D. Mass.) - Imstem Deposition Notices

All,

Attached please fine Imstem's deposition notices for:

- 1. Dr. Kimbrel (June 12)
- 2. Dr. Lanza (June 13)
- 3. 30(b)(6) Topic Set I (June 14)
- 4. Dr. Chu (June 17)
- 5. Dr. Kouris (June 18)
- 6. 30(b)(6) Topic Set II (June 19)

For purposes of the 30(b)(6) notices we have distinguished between SCRMI and Astellas, recognizing that the two plaintiffs may select a common designee for both entities. Let's find a time to talk and confirm dates and times.

Per my call earlier today, Dr. Men is available on June 26 and Dr. Xu on June 28, both in Los Angeles. I am confirming Dr. Wang's availability during the week of June 12 in Boston.

Regards, Tim

Timothy R. Shannon, Partner

One Portland Square
Portland, ME 04112-0586
Office: (207) 253-4622
One Boston Place, Suite 1600
Boston, MA 02108-4407
Office: (617) 309-2600

Bio: verrilldana.com/tshannon



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